REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 1–27 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,629,097 (Keith). Applicants respectfully submit that it appears that claim language and the teaching of Keith may have been misapprehended and that the claims are in condition for allowance as noted below. Applicants also respectfully note the that Office Action does not address all of Applicants previous arguments and that if the claims are not indicated as being allowable, that a non-final action be submitted that addresses each of applicants arguments and the claim language.

For example, claim 3 requires, among other things, a knowledge container administration module that modifies a template descriptor item <u>and operative to create knowledge transformation information by extrapolating data from a raw data item capable of containing data representing raw data that is in one of a plurality of different formats</u>. The office action cites col. 25, l. 53 through col. 26, l. 19 as allegedly teaching this subject matter. Also in the "Response to Arguments Section" a new section of Keith is cited (i.e., col. 24, ll. 62–64). However, the newly cited portion merely describes a data "extraction" operation – not a raw data "extrapolation" operation as claimed. For example he states that his input data is formatted into an "Entity:Description structure" and that the "Description lists" are "processed to <u>extract</u> root terms ..." (emphasis added, Keith, col. 24, ll. 65–67). Hence, <u>he does not teach extrapolating</u> from the raw data to generate new data – he merely describes extracting portions of the raw data.

Also Keith teaches a fixed matrix representation that does not appear to provide any form of knowledge transformation information by extrapolating data from a raw data item as claimed and wherein the raw data item can contain data in one of a plurality of different formats. As set forth in Applicants' Specification, such as paragraph 47 and elsewhere, the knowledge transformation information as generated may be, for example, summary data based on the raw data such as detailed

statistical information such as an average, mean and mode of a force needed to cause breakage of a housing of a mobile phone. No such extrapolating of raw data is performed in Keith as cited. Accordingly, this claim is also in condition for allowance.

The corresponding dependent claims are also in condition for allowance for similar reasons.

As per claim 1, the "Response to Arguments" section fails to address applicants prior remarks. This is improper. If the rejection is maintained, Applicants respectfully submit that is must be a non-final action that addresses applicants previous remarks and that a showing be provided of where the Keith reference teaches such subject matter since it does not appear that the reference teaches what is alleged in the cited portions.

In the main portion of the rejection, it is alleged that Keith teaches organizing raw data items that are capable of containing data representing raw data that is in one of a plurality of different formats citing to col. 18, ll. 18–20. The cited portion merely states that different databases such medical databases, law databases can be tapped for "input into the methods of the current invention". However, as described, each data item is only in a single format in Keith. In other words, although different databases may be accessed, the raw data such as the business section of the *New York Times* is all in a single format. In contrast, Applicants claim that the raw data item is in one of a plurality of different formats. For example, as shown in FIG. 6 of Applicants' Specification, the same single raw data item 110 can be in multiple formats, for example, formatted data, unformatted data or data links. As such, a single data item that has first and second descriptors associated therewith contain one of a plurality of different formats, whereas Keith describes an input data item having a single format. Accordingly, Applicants respectfully submit that the claim is in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

As to claim 25, Applicants respectfully reassert the relevant remarks made above with respect to claim 3 and as such, this claim is also in condition for allowance.
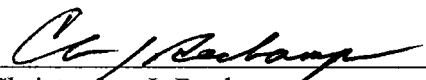
As to claim 27, Applicants respectfully reassert the relevant remarks made above and as such, this claim is also in condition for allowance. In addition, again as noted above with respect to claim 3, there is no knowledge container administrator module operative to create knowledge transformation information by extrapolating data from the raw data item and links the raw data item to the knowledge transformation information.

As to claims 5, 21, and 22 for example, Keith merely describes that XML information is used as "input" to a system. In contrast, the knowledge container itself is XML data blocks so that the raw data item, the first descriptor data item and the second descriptor data item are stored in XML data blocks. No such XML based approach is described in Keith. Accordingly, these claims are also in condition for allowance.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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